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March 3, 2020

Via ECF

The Honorable Judge Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square, Room 415
New York, New York 10007

Re: *Colon v. The City of New York, et al.*, No. 16-CV-4540
Williams v. The City of New York, et al., No. 16-CV-8193

Dear Judge Broderick:

I am counsel for Defendants New York City Housing Authority ("NYCHA"), Michael Kelly, and Brian Clarke (collectively, "the NYCHA Defendants") in the above-referenced matters, which have been consolidated for pre-trial purposes.

Pursuant to a so-ordered briefing schedule, on January 17, 2020, the NYCHA Defendants and Defendant Melissa Mark-Viverito moved for summary judgment against Plaintiffs Colon and Williams, and Plaintiff Colon cross-moved for summary judgment. The parties jointly respectfully request that in their summary judgment opposition papers, which will be filed on March 20, 2020, they be permitted to cite to their moving Local Civil Rule 56.1 statements and the evidence contained therein. Proceeding in this manner will obviate the need for the parties to submit duplicate, identical evidence to the Court.

The parties thank the Court for consideration of this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jane E. Lippman".

Jane E. Lippman

cc: Marcel Florestal, Esq. (via ECF)
Natalie Marcus, Esq. (via ECF)